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December 6, 1982

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Mr. Paul Tandler
Vice President Manufacturing
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P.O. Box 681
East St. Louis, IL 62202

Re: Water Quality Standards

Dear Paul:

On September 24, 1982 we wrote to advise you concerning forthcoming changes in the U.S.EPA water quality standards and the effect of those revised standards on states' revisions to existing regulations. On October 19 and 29, 1982, U.S.EPA published a proposed rules for water quality planning and management and water quality standards. Comments may be filed on the latter proposal until January 27, 1983. An analysis of the proposal is beyond the scope of this letter; however, it appears that the proposal generally follows the internal criteria documents previously made available which were the subject of our prior letter.

One of the key issues on the revision of water quality standards is the methodology for cost/benefit analysis. Guidance on performing such studies is included in the draft Water Quality Standards Handbook. A similar effort to establish methodologies for quantifying the monetary value of environmental requirements is being completed in Illinois under the supervision of the Economic Technical Advisory Committee. We understand there may be important differences between the Illinois and federal methodologies.

Martin, Craig, Chester & Sonnenschein

Mr. Paul Tandler Page Two December 6, 1982

If you have any questions concerning this matter, please do not hesitate to call.

Very truly yours,

Richard J. Kissel

RJK:ek